RESPONSES TO OHIO EPA COMMENTS ON THE PROJECT SPECIFIC PLANS FOR AREA 9, PHASE I PRECERTIFICATION PHYSICAL SAMPLING AND REAL-TIME SCANNING

PROJECT SPECIFIC PLAN FOR AREA 9, PHASE I PRECERTIFICATION PHYSICAL SAMPLING

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: 1.1

Pg #: 1-1

Line #: Second paragraph

Code: E

Original Comment #: 1

Comment: Typo in the second line from the last in the second paragraph.

Response:

No typo could be found in the referenced text.

Action:

None.

Commenting Organization: Ohio EPA

Line #:

Commentor: OFFO

Code: C

Section #: Figure 2-1 Original Comment #: 2

- Comment: a) Sample locations three and four are in an area where tilling has not been done on a regular basis (meaning every year or for at least not the last three years in a row). These sampling points should be collected, however, statistically, these two locations may not be from the same sample set (i.e., population). How will DOE evaluate these samples relative to the others to determine if they are appropriate to group for statistical analysis?
 - b) Based upon the concern noted in (a) and the fact that only 7 samples are proposed for analysis, what statistical basis does DOE have for concluding 7 samples are sufficient to draw significant conclusions regarding the surface soil population vs. subsurface soil population? The document should be revised to provide statistical justification for 7 samples.

Response:

This is not intended to be a statistical investigation and the data collected will not be used to draw any statistical conclusions. The purpose of this data is to get a better idea of what ASCOC concentrations are present in surface and subsurface soil in A9PI where very little soil data have previously been collected. The seven boring locations have been selected to span a range of locations throughout the plowed portion of A9PI. This data will serve as a basis for determining how to best conduct certification sampling in three dimensions since the soil has been plowed, thus eliminating a true surface layer. Also, this precertification data will provide information on ASCOC concentrations, their vertical distribution profiles, and the likelihood that all certification criteria will be met. The actual statistical analysis and conclusions will be part of the certification sampling effort.

Relevant to this comment, recent discussions with the property owner have resulted in the addition of two more borings immediately adjacent to the A1PI CU that failed certification for radium-226. A total of nine precertification borings are not proposed in A9PI, as shown in the revised Figure 2-1.

Action:

Add two more precertification boring locations in A9PI, as discussed above.

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: 4.0

Pg #: 4-1

Line #: First paragraph

Code: C

Original Comment #: 3

The first paragraph mentions that a field blank will be collected if conditions are susceptible to cross contamination. However, this statement does not correspond to the DOE's Data Quality Objectives in Section 7.3 on page 5 of the last paragraph. According to the DOOs, field blanks are not needed for metals in soil and states that it is unlikely metals will cross contaminate during field conditions. Please correct.

Response:

Agree. No field blank will be required

Action:

The referenced text will be removed from the DOO and PSP.

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: 4.0

Pg #: 4-1

Line #: Third paragraph

Code: C

Original Comment #: 4

Comment: In addition to QA receiving the completed V/FCN, Ohio EPA must receive the changes as

well.

Response:

Agree. All V/FCN forms are currently sent to the EPA on a monthly basis. This will

continue to be the case.

Action:

None.

PROJECT SPECIFIC PLAN FOR AREA 9, PHASE I PRECERTIFICATION REAL-TIME SCANNING

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: 1.3

Pg #: 1-4

Line #: First paragraph

Code: C

Original Comment #: 1

Comment: This section references part of A1PI that is going to be included in the A9PI certification. Even though it is not part of this precertification scanning, this area should be identified on Figure 1-1 for reference. Please add this location.

Response:

Agree.

Action:

This area will be added to Figure 1-1.

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: 2.1

Pg #: 2-1

Line #: Last line

Code: C

Original Comment #: 2

Comment: The OEPA has no plans to approve the RSS without being provided more information. With this taken into consideration, please clarify what other method will be used for places inaccessible by the RTRAK.

Response:

The revised RTRAK Applicability Report submitted to the EPAs in January includes the use of the RSS. If the RSS has not been approved by the EPAs when this scanning is conducted next winter, the HPGe will be used in place of the RTRAK. As stated in Section 2.1 of the PSP, the HPGe detector will be used to scan areas if neither the RTRAK

or the RSS can be used.

Action: None.

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 5.0 Pg #: 4-1 Line #: Second paragraph Code: C

Original Comment #: 3

Comment: This paragraph talks about 'geodimeter data'. Please provide an explanation for what this

is.

Response: The Geodimeter is a survey instrument.

Action: None.